

Summary of SGC American Tunnel Work Plan

The objective of the Work Plan is to develop a comprehensive understanding of the impacts of the American Tunnel at Gladstone on the water quality in Cement Creek and the Animas River and practical remedial alternatives. The steps are as follows:

- SGC will collect and summarize known information concerning the tunnel's history and construction, including bulkheads.
- SGC will collect and summarize known information concerning the location of fractures, faulting, mineralization, and bulkheads, and the impacts thereof as they relate to water flows and chemistry with respect to the American Tunnel at Gladstone and proximate seeps in the Gladstone area.
- SGC will collect and summarize existing data relating to discharges from the American Tunnel at Gladstone, including discharges from proximate seeps in the Gladstone area. SGC will determine and undertake such additional sampling as may be required to have a satisfactory understanding of metals loading to Cement Creek from the Gladstone area.
- SGC will evaluate the existing outer bulkhead's placement, design, and construction, to determine whether there are practicable measures that could be applied to improve capture and reduce flow from the American Tunnel at Gladstone.
- SGC will evaluate selected practical treatment options capable of mitigating metals loading from the American Tunnel at Gladstone and proximate seeps in the Gladstone area. This will include a re-evaluation and cost analysis of lime treatment and an evaluation of a potentially promising new technology that SGC is presently investigating.

SGC will develop detailed schedule, sequence and locations for the above described work. This information, together with a section addressing roles and responsibilities and the review process, will be included in the Work Plan.